

I and the President of Lovcom, Inc. and General Manager of stations KROE-AM, KZWY-FM, KWYO-AM, KYTI-FM, and KLQQ-FM, which are all licensed to Lovcom, Inc. All of our stations are licensed to Sheridan, Wyoming, except for KLQQ-FM, which is licensed to Clearmont, Wyoming, a small community of 115 people located in Sheridan County but about 28 miles from the City of Sheridan. I have been the owner and General Manager of KROE-AM since 1974. The other stations have been added to our group at various times since then. The population of Sheridan County is about 26,000. The population of the City of Sheridan is about 16,000.

It is my opinion that although the FCC's intent is well meaning, a number of the proposals could have the exact opposite effect.

A. Community Advisory Boards. My understanding is that the FCC is concerned about whether or not radio stations are in touch with their communities and that because stations may not be in touch with their communities, some sort of formalized ascertainment is needed. I just looked at the individuals and organizations we have interviewed on our talk show, Public Pulse during the month of April: the Animal Shelter, the Court Appointed Special Advocates, the Mayor, Project Schoolhouse, Earth Day, the Library, the Chamber of Commerce, the Hospital, the Wyo Theatre, the Sheridan College Career Expo, the Superintendent of School District #1, the Sheridan Transportation Planning Process, the Civic Theatre Guild, Westerner's International, the Week of the Young Child, the Center for a Vital Community on recycling, Mark Gordon a candidate for Congress, the County Commissioners, Sheridan College, the Superintendent of School District #2, the Sheridan County Historical Society, Volunteers of America, the Cloud Peak Symphony, the Sheridan-Johnson County chapter of the Wyoming Community Foundation, the Sheridan Child Protection Team on child abuse in Sheridan County, the Senior Center, Fernando Pages on Affordable Housing, the County Assessor, CHAPS Equine Assisted Therapy, and State Representative Jack Landon. Isn't this group of individuals more than adequate to accomplish what is being looked for in a Community Advisory Board? This is a very typical representation of the types of members from our community we interview every day and every month. Could we get some of them together for some sort of meeting? Probably, but these are all busy people, and I'd have to wonder what it would accomplish beyond what we are already doing.

B. Main Studio Rule. Requiring stations to maintain their studios within the community of license would be very harmful to broadcasting. The FCC needs to take a good look at the size of a number of the communities in which you would be asking us to maintain studios. As I mentioned earlier, one of our stations is licensed to Clearmont, Wyoming, a town of 115 located about 28 miles from Sheridan. For us to maintain studios in Clearmont rather than to have them co-located with our other stations would be a terrible waste of resources. It has been the FCC's policy to issue quite a few licenses to communities that could never have been expected to support a stand alone radio station. For the FCC to now retroactively change the rules and expect there to be studios in each of these very small communities would very simply be wrong. Maybe the best example of this would be Lost

Cabin, Wyoming, which actually has no population.

C. Remote Station Operations. It is my understanding the FCC is interested in having a physical presence at each broadcast facility during all hours of operation so that stations can respond to emergencies. The technology exists today to allow stations to do a better job of responding to emergencies with technology than they could by using staff. As things stand now, when there is an Amber Alert or severe weather warnings, we have things set up so that the appropriate authorities interrupt our programming and directly broadcast whatever it is they want our listeners to know. We have also had meetings with local emergency officials to set it up so that they can do the same thing. Why is this better? First, there wouldn't be the delay in time there would be if the official had to call the station, explain the situation to the staff member on duty and then wait for the staff person to get something on the air. Second, the truth of the matter is that the type or person who will be staffing a station during the currently unattended hours will in all likelihood be the lowest paid, least experienced person on our staff who has probably never had to deal with an emergency situation before. Can anyone really believe that involving the station's least experienced personnel would be better than using existing technology to allow trained emergency personnel to say exactly what they want said when they want it said by interrupting the existing programming?

D. Voice Tracking. Limiting radio stations' ability to voice track would limit a station's ability to do the best job possible and force stations to allocate limited resources less efficiently than they might do otherwise. Voice Tracking, satellite delivered music formats and other similar types of programming have allowed us to do a much better job of serving our community. For the purposes of explanation, let me use one of our stations, KYTI-FM as an example. If we were required to staff this station with live announcers all of the time, we would be forced to staff the station with inexperienced entry level personnel. As it is, we have a two person live morning show, and then go to voice track type of programming for the rest of the day. We do have people in studio to update the weather, etc. The host of the morning show came to us with fifteen years of experience in much larger markets such as Green Bay, Wisconsin and Eugene, Oregon. If we were required to re-allocate resources so as to do away with the hours we do voice tracking, we wouldn't have a second person on the morning team and we wouldn't have someone with the experience the host has. So what? Let me tell you about something they did a few weeks ago. The host of the show attempted to persuade his co-host to ride a lawnmower from one end of town to the other. They discussed it in passing during a break and the idea came up to do it for charity. A listener, who chairs the local Relay for Life, immediately e-mailed the host to say Relay for Life would love to be involved if they actually did it. The co-host said he would do it if listeners would pledge at least \$1,000. By the end of the show, they had raised nearly \$500 and by the end of the second day, the \$1,000 was reached. Shipton's Big R provided the lawnmower, a gas station provided the gas, and a local police officer trailed them with flashing lights. To up the ante, the co-host said he would make the ride in a pink tutu if an additional \$1,000 was raised---which it was---and the host offered to do the show in the pink tutu if they could get at least

\$3,200. In all, they ended up raising \$4,500. The point I'm trying to make is that by being able to concentrate our available programming resources into a better paid, more experienced host and co-host, instead of spreading these programming dollars throughout the entire day, we end up doing a better job of serving our community. A less experienced entry level announcer would not have thought up and pulled off this type of stunt and the Sheridan community (and Relay for Life) would have been worse off for it.

Thank you for your consideration of my comments.

Kim Love